In re:

| Exigent Landscaping, LLC, | Case No. 23-46912-TJT |
|---------------------------|-----------------------|
| | Chapter 7 |
| Debtor. | Hon. Thomas J. Tucker |
| / | |

MOTION FOR ORDER SETTING BAR DATE FOR FILING CHAPTER 11 ADMINISTRATIVE CLAIMS

Chapter 7 Trustee Mark H. Shapiro ("Trustee") brings this motion seeking entry of an order setting a bar date for filing Chapter 11 Administrative Claims pursuant to Fed. R. Bankr. P. 1019(6) and states as follows:

- 1. Exigent Landscaping, LLC dba Exigent Design and Build ("Debtor") filed a petition for relief under Chapter 11 of the U.S. Bankruptcy Code on August 7, 2023 (Docket #1). The case was converted to a Chapter 7 on February 12, 2024 (Docket #152).
- 2. Pursuant to Fed. R. Bankr. P. 1019(6), the deadline to file requests for administrative expenses incurred during a Chapter 11 case that subsequently is converted to Chapter 7 is "before conversion or a time fixed by the Court."
- 3. As the Trustee requires accurate claim information to administer this estate, the Trustee asks that the Court set a claims bar date for claimants to seek approval of any administrative claims that arose while this case was in Chapter 11.

4. Authority for the requested relief is Fed. R. Bankr. P. 1019(6) and 11 U.S.C. § 105(a).

5. The Trustee proposes to set a bar date of May 20, 2024, which is also the general deadline to file claims in this case (*see* Docket #160).

Wherefore, the Trustee requests that this Court grant his motion as set forth in the attached proposed order and for such further relief as the Court deems appropriate.

Steinberg Shapiro & Clark

/s/ Tracy M. Clark (P60262) Attorney for Chapter 7 Trustee 25925 Telegraph Rd., Suite 203 Southfield, MI 48033 (248) 352-4700 clark@steinbergshapiro.com

Date: March 1, 2024

| In re: | |
|---------------------------|------------------------------------|
| Exigent Landscaping, LLC, | Case No. 23-46912-TJT |
| Debtor. | Chapter 7 Hon. Thomas J. Tucker |
| / | |

ORDER SETTING BAR DATE FOR FILING CHAPTER 11 ADMINISTRATIVE CLAIMS

This matter is before the Court on the Trustee's Motion for Order Setting

Bar Date for Filing Chapter 11 Administrative Claims (the "Motion"; Docket

#____). Notice of the Motion was served on creditors and interested parties and no objections were timely filed.

IT IS ORDERED that all requests for approval of administrative expenses pursuant to 11 U.S.C. § 503 that were incurred before conversion of this case to Chapter 7 must be filed with the Court no later than **May 20, 2024**.

In re:

Exigent Landscaping, LLC, xx-xxx5176 dba Exigent Design and Build 13246 23 Mile Road Shelby Township, MI 48315 Case No. 23-46912-TJT Chapter 7 Hon. Thomas J. Tucker

Debtor.

NOTICE OF MOTION FOR ORDER SETTING BAR DATE FOR FILING CHAPTER 11 ADMINISTRATIVE CLAIMS

Chapter 7 Trustee Mark H. Shapiro has asked the Court to set a Bar Date of **May 20, 2024**, for the filing of Chapter 11 (*i.e.*, pre-conversion) Administrative Claims that might be requested under 11 U.S.C. § 503.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Trustee's motion, or if you want the Court to consider your views on the motion, then within 14 days from the date of service of this notice, you or your attorney must:

File with the Court a written objection or request for hearing, explaining your position at:¹

U.S. Bankruptcy Court 211 West Fort Street Detroit, Michigan 48226

If you mail your objection or request for hearing to the Court for filing, you must mail it early enough so the Court will **receive** it before the 14-day period expires. All attorneys are required to file pleadings electronically.

¹ Objection or request for hearing must comply with F. R. Civ. P. 8(b), (c), and (e).

You must also send a copy to:

Tracy M. Clark, Esq. Steinberg Shapiro & Clark 25925 Telegraph Rd., Suite 203 Southfield, Michigan 48033

If an objection or request for hearing is timely filed, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time, and location of the hearing.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Steinberg Shapiro & Clark

/s/ Tracy M. Clark (P60262) Attorney for Trustee 25925 Telegraph Rd., Suite 203 Southfield, MI 48033 (248) 352-4700 clark@steinbergshapiro.com

Date: March 1, 2024

| In re: | |
|---------------------------|------------------------------------|
| Exigent Landscaping, LLC, | Case No. 23-46912-TJT Chapter 7 |
| Debtor. | Hon. Thomas J. Tucker |
| / | |

CERTIFICATE OF SERVICE

I certify that on March 1, 2024, I served copies as follows:

Document Served: Notice of Motion for Order Setting Bar Date for Filing

Chapter 11 Administrative Claims

Served Upon: All non-ECF parties listed on attached Official Court

Matrix

Method of Service: First Class Mail

/s/ Christine T. Leach, Legal Assistant Steinberg Shapiro & Clark Attorneys for Trustee 25925 Telegraph Rd., Suite 203 Southfield, MI 48033 (248) 352-4700 cleach@steinbergshapiro.com Label Matrix for local noticing 0645-2 Case 23-46912-tjt Eastern District of Michigan Detroit

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Fri Mar 1 14:16:59 EST 2024

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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(d)AmeriCredit Financial Services, Inc. dba GM Financial P O Box 183853 Arlington, TX 76096 Bill 6220 America Center Dr. Suite 100 San Jose, CA 95002

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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